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Attorney for Defendant
THOMAS ALEJANDRO MANZANO

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Honorable William Q. Hayes)

UNITED STATES OF AMERICA, Plaintiff, v. **THOMAS A. MANZANO**, Defendant.	Crim No. 07cr 2985-WQH **DECLARATION IN SUPPORT OF EX PARTE APPLICATION OF DEFENDANT THOMAS MANZANO FOR EXTRAORDINARY EXPENSES FOR REPRODUCTION COSTS PURSUANT TO TITLE 18 U.S.C. SECTION 3006a(d)(2) AND (5)**

I, Nancy Bryn Rosenfeld, declare as follows:

1. I am an attorney licensed to practice in the courts of the State of California and before this Court. I have personal knowledge of the facts set forth in this declaration and could, if called to testify, testify competently as to the facts set forth herein.

2. I have been appointed by the court to represent Thomas Manzano who is charged in a 9-defendant indictment which alleges conspiracy to distribute methamphetamine.

3. The government has selected Copy Connection as the provider for copying services in this case.

4. On December 7, 2007, I received a fax from Copy Connection

informing me that 1534 pages of discovery, and compact disks were ready for duplication and distribution. The total cost for this discovery order is $184.08 for paper copies and $46.02 for copies of the CDs in OCR form.

5. Based on the government's representations as well as from speaking to counsel in related cases, I anticipate that this discovery order is the first of many more. I request that Copy Connection be allowed to submit its billing for reproduction costs of government discovery directly to the Court on a CJA form for approval.

6. I have been informed that the CJA Cashier prefers a set amount on the orders rather than an open-ended order. Given the amount of discovery in this case, I request that this Court authorize up to $1,500 for reproduction costs. Should copy expenses exceed that amount, I will submit a second request to this Court.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on December 8, 2007 at San Diego, California.

/s/Nancy Bryn Rosenfeld
NANCY BRYN ROSENFELD